REMARKS

Claims 1, 4-6, 8-10, 13-15 and 17-22 have been rejected under 35 USC § 103(a) as being anticipated by Lee et al '307 or Sekoguchi et al '271. This rejection is respectfully traversed with respect to these claims as amended herein.

Specifically, these claims variously recite the apparatus and method for generating ions including "electrodes spaced apart across a gap disposed for passing a flowing gas therethrough ... applying alternating ionizing voltage to the electrodes ... and selecting the frequency of alternating ionizing voltage to establish [for generating] positive and negative ions substantially concentrated centrally within the gap."

In addition, the dependent claims are further limited by various recitations of moving the generated ions from within the gap, or capacitive coupling of ionizing voltage to an electrode to self-balance generated ions within the gap.

These aspects of the claimed invention are not disclosed or even suggested by either Lee et al '307 or Sekoguchi et al '271. Although each of these references disclose applying high-frequency voltages to electrodes for forming ions, it should be noted that Sekoguchi et al '271 discloses no gap between electrodes through which flowing gas may pass, as claimed by Applicants. Instead, that reference discloses electrodes 12, 13 disposed on opposite sides of a glass barrier wall of

tube 11. That reference is therefore not conducive to any broadened analysis or interpretation of its disclosure in order to establish similarity or resemblance to Applicants' claimed invention without impermissibly altering the purpose or operational objectives of the reference. And, although the Examiner has correctly noted that Lee et al '307 generates ion in a gap between electrodes, this reference nevertheless fails to disclose any method or mechanism for substantially concentrating generated ions centrally within the gap, in any manner resembling Applicants' claimed invention. At best, a random array of generated ions appears between electrodes in this reference but there is no disclosure, for example, of specifically selecting a frequency of alternating ionizing voltage in order to substantially concentrate the generated ions centrally within the gap between electrodes, as claimed by Applicants. It is therefore respectfully submitted that the deficient disclosures of each of these references as separately applied by the Examiner against Applicants' claims fail to establish even a *prima facie* basis, including all claimed steps or elements, from which a proper determination of obviousness could be made. Claims 1, 4-6, 8-10, 13-15, and 17-22 as now amended are therefore submitted to be patentably distinguishable over the cited art.

Allowance of claims 2, 3, 11, 12 and 19 is noted with appreciation. Dependent claims 7, 16, and 23 pending within this application (but not

specifically addressed) are now also submitted to be patentably distinguishable over the cited art.

Reconsideration and allowance of claims 1, 4-10, 13-18 and 20-23 along with claims 2, 3, 11, 12 and 19 are solicited.

Respectfully submitted,
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